

IN THE COURT OF CRIMINAL APPEALS OF TEXAS

TAYTON SETH FINLEY  
*Appellant*

VS.

THE STATE OF TEXAS  
*Appellee*

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FILED  
COURT OF CRIMINAL APPEALS  
4/20/2023  
DEANA WILLIAMSON, CLERK  
NO. PD-0634-22

APPELLANT'S MOTION FOR EXTENSION OF TIME  
TO FILE BRIEF ON THE MERITS

TO THE HONORABLE JUDGES OF SAID COURT:

TAYTON SETH FINLEY, Appellant in the above-styled and numbered cause, by and through his attorney of record, WILLIAM R. BIGGS, hereby moves for an extension of time to file his brief on the merits. He would respectfully show the Court the following.

1. Current Deadline for filing Appellant's Brief: April 24, 2023.
2. Length of Time Requested for the Extension: 21 days.
3. Number of Prior Extensions of Time: One
4. Counsel takes this Court's deadlines seriously. The additional time is requested so as to give Counsel additional time, conduct legal research responsive to the Court's questions, and prepare the brief.
5. Counsel is about to begin a sexual assault trial today, April 20, 2023 in *State v. Gabriel Ybarra*, Cause No. 1773209, 213th District Court, Tarrant County Texas. The trial is expected to last approximately one

week. The last few weeks he has been busy preparing for this trial. Additionally, Counsel is preparing for a punishment hearing in a murder trial, which is set to commence on May 8, 2023. *State v. Jarvis Franklin*, 1580073, 396th District Court, Tarrant County, Texas.

6. During the briefing period, Counsel has ben pressed on other appellate matters. Specifically,

Initial Brief *Ross v. State*, No. 02-22-00160-CR Second

Court of Appeals (filed 4/11 )

PDR            *Floyd v. State*, PD-0148-23 (filed 4/18)

7. The State does not oppose the motion.
8. Appellant is not currently incarcerated.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Court will extend the time within which to file Appellant's Brief on the Merits by 21 days, until May 15, 2023.

Respectfully submitted,

/s/ William R. Biggs  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2023, I will file a copy of the foregoing electronically. Mr. Dallas Andersen will receive electronic notice of this filing at CCAAppellatealerts@tarrantcountytexas.gov, and the State Prosecuting Attorney will receive electronic notice at information@spa.texas.gov.

/s/ William R. Biggs

WILLIAM R. BIGGS

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Status as of 4/20/2023 10:18 AM CST

Associated Case Party: Tayton SethFinley

Name	BarNumber	Email	TimestampSubmitted	Status
William Biggs	24052832	wbiggs@williambiggslaw.com	4/20/2023 10:08:15 AM	SENT

Associated Case Party: Tarrant County Criminal District Attorneys Office

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